



August 8, 2005

National Organic Standards Board (NOSB)  
United States Department of Agriculture  
Washington, DC

Re: Comments on Handling Committee Recommendation Relative to "Agricultural" and "Nonagricultural" Substances

Dear Members of the Board:

I support the request to the NOSB by Marroquin International Organic Commodities Services, Inc., on July 30, 2004, to reclassify yeast as an "agricultural product" instead of a "nonagricultural substance." This step is necessary to enable organic yeast to become an accepted organic ingredient.

On July 18, 2005, the Handling Committee of the NOSB recommended that yeast not be classified as an "agricultural product," thus preventing the recognition of organic yeast. The full NOSB will take up this recommendation at its meeting in Washington on August 15-17, 2005. I wish to record my opposition and ask that the Handling Committee reconsider its recommendation.

The Handling Committee gives its reasons for finding that yeast is not an "agricultural product" in a "Proposed Guidance Document." This document states that yeasts and mushrooms are both fungi, but because of certain differences between yeasts and mushrooms, it draws the conclusion that mushrooms are "agricultural" but yeasts are not. The main difference that it cites is that mushrooms grow into multi-cellular "fruiting bodies," while yeasts are one-celled organisms that grow by budding.

We all look to the NOSB to recommend organic standards that are in the best interests of the organic community. This decision on yeast is not an academic exercise. It is making NOSB policy that would have important consequences for the organic integrity of processed foods. Mushrooms and yeasts are both natural organisms and both get their nutrients from substrates of natural, agricultural materials (sugar, in the case of yeasts). From an organic standpoint, why should it matter how many cells each one has, or whether their reproduction comes in "fruiting bodies" or "buds"?

If yeast is not reclassified as "agricultural," then conventional yeast will permanently be a common ingredient in processed foods labeled as "organic." The production of conventional yeast depends on ammonia, sulfuric acid, caustic soda lye, synthetic vitamins and a synthetic antifoaming agent. It goes through rinsing twice and results in contaminated wastewater that needs complex purification. Organic yeast would be a dramatic improvement. It is grown on a substrate of organically farmed grain, it needs no chemicals to produce and yields no contaminated wastewater.



Certified organic yeast made this way is available today. The intent of the OFPA and the NOP regulations is to encourage the maximum use of organic ingredients when they become commercially available, but until yeast is classified as an "agricultural product," organic food processors will be under no requirement to use organic yeast. I call on the NOSB to correct this problem by supporting the designation of yeast as an "agricultural product."

Sincerely yours,

A handwritten signature in black ink, appearing to read "Roland E. Hoch". The signature is fluid and cursive, with a long horizontal stroke at the end.

Roland E. Hoch  
Vice President